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Attorneys for Defendants
COUNTY OF ALAMEDA and GREGORY J.
AHERN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JASMINE GAFFETT, KIERRA BROWN,
and TOSHUA SEARS, Individually and on
behalf of a class of all persons similarly
situated,

Plaintiffs,

v.

CITY OF OAKLAND, SUSAN
MANHEIMER, LERONNE
ARMSTRONG, RONALD HOLMGREN,
RANDALL WINGATE, ALAMEDA
COUNTY, GREGORY J. AHERN, DOES
3-100,

Defendants.

Case No. 3:21-cv-02881-RS

**STIPULATION AND ORDER TO
MODIFY INITIAL CASE
MANAGEMENT SCHEDULING ORDER
[DKT. 51]**

WHEREAS on November 18, 2021, the Court entered an Initial Case Management Scheduling Order (Dkt. No. 51) setting forth the following pertinent case management deadlines:

1. Conduct Settlement Conference within 150 days;
2. Amendment of Pleadings by February 1, 2022;
3. Complete fact discovery by April 29, 2022;
4. Hear motion for class certification by July 28, 2022;

WHEREAS, the court has not yet set other case management dates, such as expert discovery cutoff or deadlines for dispositive motions or trial;

WHEREAS, the parties have exchanged and responded to extensive initial written discovery and have produced collectively thousands of documents and body-worn camera footage files;

WHEREAS, the parties have a Mandatory Settlement Conference before Judge Beeler on March 22, 2022;

WHEREAS, counsel for the Alameda County Defendants has a pre-paid family vacation during school Spring Break from April 4 through April 8, 2022;

WHEREAS the parties are actively scheduling depositions of all parties after the Mandatory Settlement Conference and contemplate follow-up written discovery to prepare for dispositive and other motions;

STIPULATION

THEREFORE, it is hereby stipulated by and between the Parties, through their respective counsel of record, that the Initial Case Management Order be modified as follows:

- (1) The deadline for completion of fact discovery shall be June 30, 2022;
- (2) The deadline for amendment of pleadings shall be May 1, 2022;
- (3) The deadline to hear the motion for class certification shall be September 29, 2022.

IT IS SO STIPULATED.

[signatures on following page]

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1 Dated: March 2, 2022

ALEXSIS C. BEACH &
RACHEL LEDERMAN, Attorneys

2
3 By: /s/ Rachel Lederman
4 Rachel Lederman
5 Attorneys for Plaintiffs

6 Dated: March 2, 2022

FLYNN LAW OFFICE

7
8 By: /s/ R. Michael Flynn
9 R. Michael Flynn
10 Attorneys for Plaintiffs

11 Dated: March 2, 2022

BARBARA J. PARKER, CITY ATTORNEY

12
13 By: /s/ Barbara J. Parker

14 Attorneys for Defendants
15 CITY OF OAKLAND, SUSAN
16 MANHEIMER, AND LERONNE
17 ARMSTRONG

18 Dated: March 2, 2022

BURKE, WILLIAMS & SORESENSEN, LLP

19
20 By: /s/ Gregory B. Thomas
21 Gregory B. Thomas
22 Temitayo O. Peters
23 Attorneys for Defendants
24 COUNTY OF ALAMEDA and
25 GREGORY J. AHERN

26
27 **SIGNATURE ATTESTATION**

28 In accordance with Civil Local Rule 5(i)(3), I, Gregory B. Thomas, attest that I have
obtained concurrence in the filing of this documents from the other signatory listed above.

By: /s/ Gregory B. Thomas
GREGORY B. THOMAS, ESQ.

ORDER

This Court reviewed and considered the above stipulation among the parties. Based on the representations submitted herewith, and for good cause shown, it is hereby ORDERED that the Initial Case Management Order (Dkt. 51) is modified as follows:

- (1) The deadline for completion of fact discovery shall be June 30, 2022;
- (2) The deadline for amendment of pleadings shall be May 1, 2022;
- (3) The deadline to hear the motion for class certification shall be September 29, 2022.

IT IS SO ORDERED.

DATED: March 2, 2022



HON. RICHARD SEEBORG
United States District Judge